23-01140-JAW Dkt 93 Filed 09/18/23 Entered 09/18/23 11:25:00 Page 1 of 2

IN THE UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

BISON LAND & MINERALS, LLC

**CHAPTER 11** 

Debtor

**CASE NO. 23-01140-JAW** 

MOTION TO WITHDRAW AS COUNSEL FOR THE DEBTOR-IN-POSSESSION

COME NOW the Law Offices of Craig M. Geno, PLLC and Craig M. Geno (the "Movants"), and file this their Motion to Withdraw as Counsel for the Debtor-in-Possession (the "Motion"), and

in support thereof, would respectfully show unto this Honorable Court as follows, to-wit:

1. This Honorable Court has jurisdiction of the subject matter herein and the parties

hereto. This is a core proceeding.

2. Irreconcilable differences have arisen by, between and among the Movants and Geary

Trigleth, current representative of the Debtor. Theses irreconcilable differences require, Movants

respectfully submit, that Movants seek authority of the Court to withdraw as counsel for the Debtor-

in-Possession.

3. In the event the Court grants the Motion, Movants will work closely with replacement

counsel to transition the role of counsel in this case.

4. Other grounds to be assigned upon a hearing hereof if necessary.

WHEREFORE, PREMISES CONSIDERED, Movants respectfully pray that upon a hearing

hereof this Honorable Court will enter its order allowing them to withdraw as counsel for the Debtor-

in-Possession. Movants pray for general relief.

THIS, the \_\_\_\_\_ day of September, 2023.

Respectfully submitted,

LAW OFFICES OF CRAIG M. GENO, PLLC AND CRAIG M. GENO

By Their Attorneys,

LAW OFFICES OF CRAIG M. GENO, PLLC

Sy: Craig M. Geno

## OF COUNSEL:

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## **CERTIFICATE OF SERVICE**

I, Craig M. Geno, do hereby certify that I have caused to be served this date, via electronic filing transmission, a true and correct copy of the above and foregoing to the following:

Christopher J. Steiskal, Esq. Office of the United States Trustee <a href="mailto:christopher.j.steiskal@usdoj.gov">christopher.j.steiskal@usdoj.gov</a>

Mr. Geary Trigleth g.trigleth@bisonexploration.com

Robert A. Byrd, Esq. Subchapter V Trustee rab@byrdwiser.com

ΓHIS, the  $\int \int \nabla$  day of September, 2023.

Craig M. Geno